



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217.782.6762

August 1, 2000

Mr. Kevin Turner
U.S. EPA
c/o Crab Orchard National Wildlife Refuge
8588 Route 148
Marion, IL 62959

Reference: 1630200005 St. Clair County
Sauget Area 1 Site
Superfund/Technical
Time Critical Removal Action Draft Work Plan dated June 30, 2000
Administrative Order dated May 31, 2000; Docket No.: V-W-99-C-554

Dear Mr. Turner:

The referenced document for the Dead Creek sediment and soil removal project in Sauget and Cahokia was received from Solutia Inc. on July 3, 2000, and review comments are due to you at COB on August 4, 2000. It is my understanding that Rob Watson will be sending you his comments on the landfill design sections of the draft work plan under separate cover. To avoid duplicate reviews, I have not reviewed Section 9.

General Comment. A groundwater monitoring program as required by Section V.3.B.6 of the referenced administrative order is not included in the draft work plan for review and comment. This is a significant deficiency and Solutia Inc. should provide a draft program for immediate review in order to meet this project's expedited schedule.

Section 2.1 page 2-5. In consideration of Solutia Inc.'s familiarity with Monsanto's operations at the W.G. Krummrich Plant, the description of wastewater contaminants should be more specific and detailed.

Section 2.7 page 2-15. The statement is made that the Village of Cahokia prohibits the use of groundwater as a drinking water source; however, it is also stated that ten private wells are located within one mile of the proposed containment cell. Does the Village of Cahokia have an

GEORGE H. RYAN, GOVERNOR

ordinance which prohibits groundwater use? How is the prohibition enforced regarding the existing private wells, even if the current use is reportedly for watering lawns? If the intent of these statements is to eliminate the human exposure to groundwater pathway, that should be stated.

Section 3 SSP Sediment Bioassay Tables. Several results are noted in the tables with a "-"; explain in the table notations what the "-" represents. Those results should also be described in the text.

Section 3.5 page 3-12. What is the significance of reporting average contaminant concentrations in the summary? Is it appropriate to report maximum contaminant concentrations instead?

Section 4.3 pages 4-3 and 4-4. The issue of culvert size and replacement for all segments of Dead Creek should be thoroughly discussed relative to 1) the requirements for culvert replacement as described in the June 21, 1999 UAO; 2) the Village of Cahokia flooding study; 3) impacts to Dead Creek Segment F, focused on the Segment F wetlands; 4) the management of storm water and the potential for highway flooding at the junction of Routes 3 and 157.

You should note that these comments do not address issues of natural resource injury, natural resource damage assessment, and natural resource restoration. If you have any questions, please call me at 217.785.9397.

Sincerely,



Candy Morin, Remedial Project Manager
National Priorities List Unit
Federal Site Remediation Section
Division of Remediation Management
Bureau of Land

cc: Mike McAteer, EPA Region V
W. Rob Watson, IEPA
Mike Henry, IDNR
Denise Stoeckel, IDNR
Kevin de la Bruere, USFWS